

# **Exhibit S**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF LAUREN A. SMITH**

COMES NOW the declarant, LAUREN A. SMITH, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. I was employed at Keefe, Bruyette & Woods Inc. on September 11, 2001. When the terrorist attacks occurred, I was in my office on the 89<sup>th</sup> floor of the World Trade Center Tower Two.

4. When the first plane hit Tower One, I could feel our building shake. I looked out the window and saw flames and the plane sticking out of the side of Tower One. Several colleagues and I evacuated using the elevators. When we were at approximately the 25<sup>th</sup> floor, a plane struck Tower Two causing the elevator we were in to free-fall. Although the emergency

brakes kicked in, it was a very hard landing. Something hit my leg, which severely injured it and caused a hematoma.

5. When the elevator finally stopped, a fire had broken out inside it, and it was wedged between floors. Due to the damage to the elevator, we were able to create an opening so that I and another colleague could escape. As I jumped from the elevator to the lobby below, I fell into the elevator shaft and landed on a beam, fracturing four to five ribs and collapsing a lung.

6. I was carried out of the building on a stretcher and put into an ambulance across the street when Tower Two fell, covering the area with its millions of tons of concrete, glass, and the remains of its slain occupants. I walked to the hospital surrounded by debris and a huge grey wall of toxic dirt. I was hospitalized for two weeks and underwent two surgeries to drain the hematoma and re-contour my leg.

7. As a result of the atrocities occurring in World Trade Center Tower Two on September 11, 2001, I also suffered from injuries to my thigh, pelvis, lung, back, and ribs. Due to my fall, my pelvis was out of alignment, requiring chiropractic treatment for the next twelve years. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

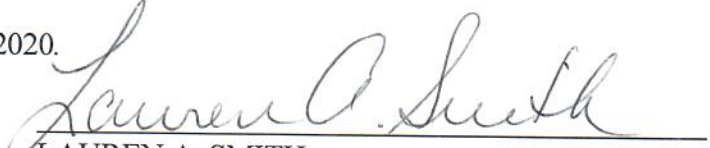
8. September 11, 2001, and its carnage is emblazoned in my memory. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. I was surrounded by death, debris, burning, and smoke. I lost friends and co-workers. The situation could only be compared to a war zone.

9. I suffered, and continue to suffer, PTSD and severe emotional distress because of the World Trade Center terrorist attacks. My enjoyment of life has disintegrated as I suffered, and continue to suffer from depression, anxiety, flashbacks, and nightmares.

10. I previously pursued a claim (Claim Number VCF 212-003441) through the September 11<sup>th</sup> Victim Compensation Fund specifically related to my injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 3<sup>rd</sup> day of January, 2020.

  
LAUREN A. SMITH

# **Exhibits Filed Under Seal**